

Exhibit A



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Our File Number 19-1306127

VIA EMAIL AND U.S. MAIL

February 18, 2020

Scott Marcus
Gabriel Dermer
Patricia Ursea
Felix Lebron
Office of the City Attorney
200 N. Main Street, 6th Floor
Los Angeles, California 90012

RE: *Garcia v. City of Los Angeles*; Case No. 2:19-cv-06182

Dear Counsel,

We have reviewed the Court's ruling on the City of Los Angeles's motion to dismiss, and in particular, the Court's denial of the City's motion to dismiss Plaintiffs' facial challenges to Los Angeles Municipal Code Sections 56.11(3)(i) and 56.11(10)(d).

The Court's ruling is clear that the Bulky Item provision is facially unconstitutional under the Fourth and Fourteenth Amendments of the United States Constitution and Article I, Sections 7 and 13 of the California Constitution. As such, the continued enforcement of the ordinance violates the rights of unhoused residents throughout the City. However, despite the clarity of the Court's ruling, today's CARE+ schedules indicate that bulky items are still subject to enforcement.

We request the City immediately cease enforcement of these provisions and stipulate to a preliminary injunction, enjoining the City from enforcing LAMC Sections 56.11(3)(i) and 56.11(10)(d). If the City is unwilling to stipulate to such an injunction, then we will seek one from the Court.

It is our hope that the parties can reach an agreement without the need for further intervention from the court. Doing so will preserve both city and judicial resources and potentially open the door to a broader conversation which Judge Fischer made clear at the February 10th hearing, should happen here. As we have indicated on numerous occasions, we remain open to working towards a meaningful resolution without protracted litigation. But of course, we will seek court intervention if necessary to protect our clients' rights.

Other Office Locations:

East Los Angeles Office, 5228 Whittier Blvd., Los Angeles, CA 90022; 213-640-3883
Long Beach Office, 601 Pacific Ave., Long Beach, CA 90802; 562-435-3501
Santa Monica Office, 1640 5th St., Suite 124, Santa Monica, CA 90401; 310-899-6200
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Letter to City of Los Angeles

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Please let us know by the close of business on Wednesday, February 19th how you wish to proceed.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Myers". The signature is fluid and cursive, with the first letter "S" being large and prominent.

Shayla R. Myers
Legal Aid Foundation of Los Angeles

Catherine Sweetser
Schonbrun Seplow Harris and Hoffman

Benjamin Herbert
Kirkland & Ellis LLP